

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>WELLPATH LLC; CORRECTIONAL</b>	)	
<b>HEALTHCARE COMPANIES, LLC;</b>	)	
<b>CORRECTIONAL HEALTHCARE</b>	)	
<b>HOLDING COMPANY, LLC; CHC</b>	)	
<b>COMPANIES, LLC; WELLPATH</b>	)	<b>No. 3:21-cv-00675</b>
<b>GROUP HOLDINGS, LLC; and</b>	)	
<b>JUDICIAL CORRECTION SERVICES,</b>	)	
<b>LLC,</b>	)	<b>Judge Waverly D. Crenshaw, Jr.</b>
	)	<b>Magistrate Judge Barbara D. Holmes</b>
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>EVANSTON INSURANCE COMPANY,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT**

Pursuant to Fed. R. Civ. P. 15 and Local Rule 15.01, and as contemplated by the November 1, 2021 Initial Case Management Order and the December 1, 2021 Order staying further briefing on Defendant's Motion to dismiss, Plaintiffs (collectively, "Wellpath") file this Motion for Leave to Amend the Complaint. A signed proposed Amended Complaint is attached as **Exhibit A**. Wellpath also relies upon the contemporaneously-filed Memorandum in Support, which describes the reasons supporting the proposed amendment and the substance of the amendment sought.

Pursuant to Local Rules 7.01(a)(1) and 15.01(a)(2), counsel for Wellpath has conferred with counsel for Defendant about the proposed amendment and has been advised that Defendant opposes the Motion for Leave to Amend.

Respectfully submitted,

SHERRARD ROE VOIGT & HARBISON, PLC

By: /s/ L. Webb Campbell II

L. Webb Campbell II (No. 011238)

Lauren Z. Curry (No. 030123)

150 3<sup>rd</sup> Avenue South, Ste. 1100

Nashville, Tennessee 37201

(615) 742-4200

*wcampbell@srvhlaw.com*

*lcurry@srvhlaw.com*

REED SMITH LLP

John N. Ellison (PA Bar No. 51098)

*(admitted pro hac vice)*

Luke E. Debevec (PA Bar No. 92860)

*(admitted pro hac vice)*

1717 Arch Street, Suite 3100,

Philadelphia, PA 19103

*jellison@reedsmith.com*

*ldebevec@reedsmith.com*

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

Service of the foregoing was accomplished through the Court's Electronic Filing System this 31st day of January, 2022, upon the following:

Bruce D. Gill  
James W. Fuller IV  
Leitner, Williams, Dooley & Napolitan, PLLC  
4th & Church Building  
201 4th Avenue North, Suite 1100  
Nashville, Tennessee 37219  
bruce.gill@leitnerfirm.com  
james.fuller@leitnerfirm.com

Timothy A. Carroll  
Clyde & Co US LLP  
200 Campus Drive, Suite 300  
Florham Park, NJ 07932  
timothy.carroll@clydeco.us

Cary J. Economou  
Clyde & Co US LLP  
1775 Pennsylvania Avenue, NW, 4th Floor  
Washington, DC 2006  
cary.economou@clydeco.us

/s/ L. Webb Campbell II  
L. Webb Campbell II